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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

VERNON UNSWORTH,

Plaintiff,

vs.

ELON MUSK,

Defendant.

Case No. 2:18-cv-08048

Judge: Hon. Stephen V. Wilson

**DECLARATION OF JARED
BIRCHALL IN SUPPORT OF
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT, OR IN
THE ALTERNATIVE PARTIAL
SUMMARY JUDGMENT**

Complaint Filed: September 17, 2018
Trial Date: December 2, 2019

Hearing Date: October 28, 2019
Time: 1:30 p.m.
Courtroom: 10A

1 **I, Jared Birchall, declare as follows:**

2 1. I make this declaration of personal, firsthand knowledge, and if called
3 and sworn as a witness, I could and would testify competently thereto.

4 2. I submit this declaration in support of Defendant's Motion for
5 Summary Judgment, or in the Alternative, Partial Summary Judgment.

6 3. Since 2016, I have worked with Defendant, Elon Musk, as the
7 President and manager of Excession LLC. Excession is Mr. Musk's family office.
8 As President of Excession, I help manage Mr. Musk's SpaceX and Tesla holdings,
9 perform work related to Mr. Musk's companies Neuralink and The Boring
10 Company, and assist Mr. Musk in personal matters.

11 4. On or around August 15, 2018, I retained James Howard, a private
12 investigator and president of the investigation firm Jupiter Military & Tactical
13 Systems to conduct an investigation of Vernon Unsworth in the United Kingdom
14 and Thailand on Mr. Musk's behalf. I understood that Mr. Howard had reached out
15 to Mr. Musk to provide investigation services on or around July 17, 2018. In my
16 communications with Mr. Howard, I used the assumed name "James Brickhouse" in
17 order to protect my identity and Mr. Musk in light of the sensitive nature of Mr.
18 Howard's work. As a result, some of my email communications are sent from an
19 account using that name.

20 5. In our email communications, Mr. Howard represented to me that he
21 was a highly-skilled and experienced private investigator. Mr. Howard stated that
22 he served in the United Kingdom Special Forces for eleven years and the United
23 Kingdom Security Service (commonly known as MI5) for two years. He also
24 represented that he worked for billionaires Paul Allen and George Soros. Mr.
25 Howard offered to provide additional professional references. A true and correct
26 copy of my August 15-16 email correspondence with Mr. Howard is attached hereto
27 as **Exhibit A**.

1 6. Additionally, Mr. Howard sent me a presentation outlining his
2 company's capabilities and security work for the 2018 Cannes Film Festival. A true
3 and correct copy of the presentation is attached hereto as **Exhibit B**.

4 7. Based on these communications, I believed Mr. Howard to be a capable
5 and credible investigator.

6 8. Excession paid Mr. Howard in excess of \$50,000 for his work and
7 investigation.

8 9. During the investigation, I communicated with Mr. Howard via email
9 and text message. We also spoke on the phone regularly.

10 10. I periodically provided Mr. Musk with oral updates of the investigation
11 and summaries of Mr. Howard's reports and findings, normally within 24 hours or
12 so of receiving them.

13 11. On August 17, 2018, I received an email from Mr. Howard
14 summarizing his initial findings. Mr. Howard wrote that "there is indeed an
15 unpleasant undertone to some of [Mr. Unsworth's] lifestyle choices" and "[t]here is
16 no question that [Mr. Unsworth] 'associates' locally with Europeans who enjoy
17 'Thai comforts' that are not acceptable in a developed society." A true and correct
18 copy of my August 17-18, 2018 email correspondence with Mr. Howard is attached
19 hereto as **Exhibit C**.

20 12. Shortly after he was retained, Mr. Howard and I had a telephone
21 conversation in which he described a Thai news article that quoted Mr. Unsworth's
22 Thai wife and reported that Mr. Unsworth married his wife when she was 18 or 19
23 years old, but that they met seven years earlier, which would make her eleven or
24 twelve years old at the time. Mr. Howard repeated this information on other calls. I
25 reported this information to Mr. Musk within a day of receiving it.

26 13. On August 27, 2018, I wrote to Mr. Howard and provided a list of
27 questions that Mr. Musk and I wanted answered. I also explained to Mr. Howard
28 that the most important aspect of his job was to provide true and accurate

1 information. I wrote that Mr. Musk and I “aren’t looking to frame anyone. If there
2 is definitively no smoking gun, then let’s get the information necessary to make that
3 determination and *it is what it is.*” A true and correct copy of my August 26-27,
4 2018 email correspondence to Mr. Howard is attached hereto as **Exhibit D**.

5 14. On August 27, 2018, Mr. Howard provided me an email with answers
6 to some of the questions that I asked. Mr. Howard wrote that Mr. Unsworth “is 63
7 years old. His wife we believe is 30 which would have put her at 18/19 when they
8 first met. The target would have been 52 yrs old at the time. This is NOT verified
9 but will be ASAP.” Mr. Howard also wrote that Mr. Unsworth had been traveling to
10 Thailand since the late 1980’s and that Mr. Unsworth’s “behaviour is at best
11 described as a ‘Manther’ – UK slang for the opposite of Cougar.” *See Ex. D.*

12 15. I orally relayed this information to Mr. Musk shortly after receiving it,
13 including that Mr. Howard reported that Mr. Unsworth associated with Europeans
14 who engage in improper sexual conduct in Thailand, and had been traveling to
15 Thailand since the 1980’s.

16 16. After Mr. Howard sent the August 27, 2018 email, he again represented
17 on phone calls that there was information and evidence suggesting that Mr.
18 Unsworth met his wife when she would have been eleven or twelve. I reported this
19 information to Mr. Musk.

20 17. On telephone calls throughout late August 2018, Mr. Howard informed
21 me that he and his team had learned that Mr. Unsworth spent significant time in
22 Pattaya Beach, a location infamous for prostitution and sex tourism, that Mr.
23 Unsworth associated with other European expatriates who engaged in inappropriate
24 sexual conduct in Thailand, and that Mr. Unsworth was unpopular at the Thai Cave
25 Rescue because other members of the rescue team regarded him as “creepy.” On
26 our calls, Mr. Howard did not use equivocal language to describe these findings.
27 Although he reported that his team was working on obtaining concrete verification,
28

1 he represented that he was confident in the information he reported. I reported the
2 contents of these calls to Mr. Musk shortly after receiving the information.

3 18. On the morning of August 30, 2018, Mr. Howard sent me a formal
4 preliminary report of his investigation of Mr. Unsworth. A true and correct copy of
5 the report is attached hereto as **Exhibit E**.

6 19. Mr. Howard's August 30, 2018 report was largely consistent with the
7 information he provided on our earlier calls and included the following statements:

- 8 • "Mr. Unsworth has been a frequent visitor to Thailand since the 1980's.
9 Prior to meeting his current wife we believe that Mr. Unsworth was
10 living in the Pattaya Beach...Pattaya Beach is synonymous with
11 prostitution and scam artists. We are in the process of verifying this
12 information which was mentioned to the lead investigator by Mr.
13 Unsworth's mother-in-law."
- 14 • "Mr. Unsworth has been described to our investigation team by other
15 UK volunteers attached to the Cave Rescue team as a 'Manther' slang
16 for an older man with a taste for younger women."
- 17 • "The sexpat whore-mongers his way through the go-go bars of
18 Thailand. His only other friends are his sexpat peers. Peek-density
19 occurs in and around Pattaya – Thailand's sin city."
- 20 • "[S]ome of the UK and Dutch divers who also volunteered stated that
21 Mr. Unsworth was not a popular or particularly liked man in the Cave
22 Rescue Team. When pushed as to why, they simply replied 'Creepy'"
- 23 • "Mr. Unsworth is an unpopular loner"

24 20. Before September 2018, when I would share the information obtained
25 by the investigator with Mr. Musk, I did not know or believe that the information
26 was untrue. Nor did I entertain any serious doubts as to its truth. At the time, I
27 believed the investigator and the investigation to be credible.
28

1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct and that this document was executed
3 in Los Angeles, California.

4
5 DATED: September 13, 2019

6
7
8 By

Jared Birchall

EXHIBIT A

From: <jaredbirchall@gmail.com> on behalf of James Brickhouse
Sent: Thu 8/16/2018 2:23 PM (GMT-07:00)
To: "Jupiter Military & Tactical Systems" <info@jupiter-private.com>
Cc:
Bcc:
Subject: Re: Invoice Project Rowena

Received, thank you. We just missed the cut-off for today, but will send it first thing tomorrow morning.

On Thu, Aug 16, 2018 at 12:17 PM, Jupiter Military & Tactical Systems <info@jupiter-private.com> wrote:

Jim,

Attached is the Invoice for **Project Rowena** which is our working title for the investigation.

Please let me know when payment has been made and I will call you tomorrow evening GMT to update you with further progress and allow provide you with some milestones and timings.

Any questions my phone is always with me 24/7

Rgds, James

Regards,

James
CEO - Qatar & UAE
Jupiter Military & Tactical Systems
Al Saad – Area 38
Street No. 893
Building No. 7
P.O. Box 22509
Doha, State of Qatar
+44 (0) 7917 401601
info@jupiter-private.com
www.jupiter-private.com

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contents of this information is strictly prohibited.

On 16 Aug 2018, at 01:33, James Brickhouse <jbrickhouse11@gmail.com> wrote:

Thanks, James. We've signed and attached the NDA.

We'd like to be able to do this for \$20,000 dollars. Does that work for you?

Thank you,

Jim

On Wed, Aug 15, 2018 at 12:05 PM, Jupiter Military & Tactical Systems <info@jupiter-private.com> wrote:

Jim,

Attached is the NDA which should be from you to me if I am the contractor if that makes sense.

Investigations as I'm sure you will know can be time consuming and are event driven. I think I have a clear remit of what specifically you are looking for and the starting point would be in the UK and in Thailand.

The UK end it quite straight forward but if there are any skeletons in the cupboard they are more likely to be in Thailand which is where I will centre the investigation.

Typically I have always worked on a retainer with these types projects and I would prove this at two men for ten days at £900 GBP per day.

That would be £18,000 for a full background investigation which would look at lifestyle choices for the target known associations, discreet enquiries in the target's place of work and relaxation.

The target is unlikely to have a history of offending in the UK as this would already have come to the surface but I think like others that his motivations for residing in Thailand may unearth some unsavoury practises and relationships.

I can provide professional references if requested.

My career in short is 11 years in the UKSF and 2 years with the UK Security Services.

Over the past 15 years I spent 10 yrs working for Vulcan Inc (Paul Allen) running his maritime and European EP and for George Soros.

Please call if you have any questions at any time.

Kind regards

James
CEO - Qatar & UAE
Jupiter Military & Tactical Systems
Al Saad – Area 38
Street No. 893
Building No. 7
P.O. Box 22509
Doha, State of Qatar
+44 (0) 7917 401601
info@jupiter-private.com
www.jupiter-private.com

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On 15 Aug 2018, at 18:40, James Brickhouse <jbrickhouse11@gmail.com> wrote:

EXCESSION, LLC

On Wed, Aug 15, 2018 at 10:23 AM, Jupiter Private <info@jupiter-private.com> wrote:
Jim, can you send me the corporation name and contact info for the NDA.

Regards,
James
CEO -Qatar & UAE
Jupiter Military & Tactical Systems
893, Doha Expy, Doha, Qatar
[+44 \(0\) 7917 401601](tel:+4407917401601)
info@jupiter-private.com
www.jupiter-private.com
<image002.jpg>

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On 15 Aug 2018, at 18:18, James Brickhouse <jbrickhouse11@gmail.com> wrote:

James,

As discussed, please forward the NDA asap, as well as a cost estimate on what work like this might entail.

Thank you,

Jim

Please call my cell anytime: [REDACTED]

<One Way Non-Disclosure Agreement For Contractor.pdf>

EXHIBIT B

From: Jupiter Military & Tactical Systems
Sent: Tue 8/21/2018 6:21 AM (GMT-07:00)
To: "Jim Brickhouse" <jbrickhouse11@gmail.com>
Cc:
Bcc:
Subject: Jupiter's- Capability Statement
Attachments: Cannes Film Festival - EP Pre-Mission Example00001.pptx; Jupiter EP Capability Statement-Excession 201800002.pdf; image00200003.jpg

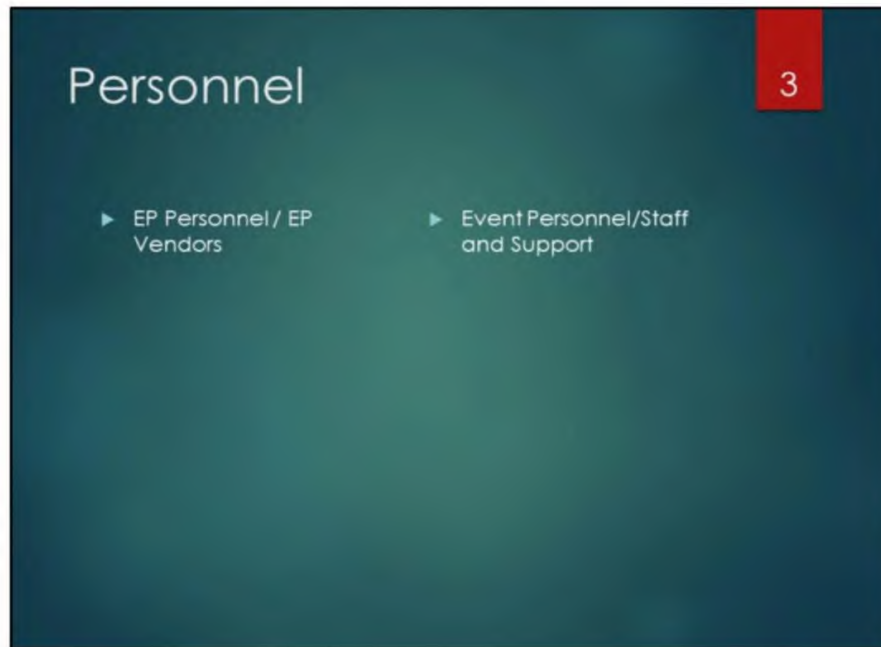
Jim,

I thought it might be useful to have some more information on our capabilities. See attached doc.

Iva also included a sanitised EP Advance presentation that we did for the Cannes FF this year. It gives you an insight into how we operate and perhaps how we may be able to support Excession LLC. I have an update on ROWENA and will contact you later today



Scope			2
Advance	Operations	Intelligence	
Personnel	Principal Support	Country Security Brief	
Contact Info	Event Staff	Regional Security Brief	
Assignment	Ticketing/Screening	Emergency POCs	
Roles and Responsibilities	Accreditation	US	
Sites	Support Staff	Embassy/Consulate	
Venues	Vendor Roles/Usage	Police, Fire, EMT	
EP Staging Areas	Vehicles and Drivers	Safe Havens	
Owner	Accreditation	Evacuation Planning	
Accommodations	Communication	Event Security	
EP Accommodations	Emergency Actions	Event Access	
FBO	Medical Actions	Offsite Events	
Yacht			



Primary Known Venues



Le Palais/Marché

Primary Venue for Cannes Film Festival Screenings and Film Market



Villa XXXX

Principal Residence, EP Down Room on site




XXXXXXX

Not shown in photos during Cannes Film Festival. Location of Principal hosted parties. Tenders are Protector and Chase


Primary Known Venues

5




Swissport
Executive
Aviation

Primary FBO for southern France. Located in Nice at the Cote D'Azur Airport



Hopital Pierre
Nouveau

Nearest Hospital to Cannes Waterfront



Gare
Maritime
Cannes

Cannes Marina, Primary Tender Access point during the Festival

Primary Known Venues

6



La Pizza
Preferred restaurant in close proximity to Gare Maritime



Astoux et Brun
Preferred restaurant. Seafood



Caffé Roma
Preferred restaurant across from Le Palais

7

EP Staging Areas

EP vehicles will be staged at various locations through the Cannes film Festival.

Primary Points will be:

- Gare Maritime
- Radisson Blu 1835
- Villa XXXX

Gare Maritime

Radisson Blu 1835



EP Accommodation

9



► Radisson Blu 1835

- EP Hotel, within walking distance (700m, 10 minutes) of Le Palais/Tender Dock, Outside of Festival Lanes
- Private Parking on site (EP Adv will arrange secure covered parking on site if possible)
- EP Command Post will be located in EP single room.
- EP Adv will arrange for drivers to rest inside if possible
- Wireless Internet / Gym / Restaurants / Laundry / Services
- Cons: On One-Way street network

FBO – Swissport Executive Aviation

10



► Swissport Executive Aviation

- Private Terminal FBO
- EP, with Air Crew Badge can gain flightline access by coordinating with Swissport Agents.
- EP can greet Principals plane-side
- Hand luggage / Pax get screened on arrival at FBO Terminal X-Ray
- Checked Luggage can be picked up planeside in Swissport vehicle, and transferred to EP vehicles at FBO Terminal
- Helo option on South HILZ transportation and logistics arranged with Swissport/Air Crew

Yacht – M/Y XXXX

11



Guest Party Decks

Starboard - Stern Guest Access

M/Y XXXX

- ▶ Captain: XXXX
- ▶ LOA: xxx
- ▶ WOA: xxx
- ▶ Draft: xxx
- ▶ Decks: 5
- ▶ HLZ: 2 (Fore and Aft)
- ▶ Tenders: Chase and Protector
- ▶ Nursing Station: On Board
- ▶ Access: Via Transom, Starboard - Stern waterline guest access hatch

Daily Principal Support

12

▶ Principle 1

- ▶ XXXX- AIC
- ▶ XXXX- Advance

▶ EP will receive direction from Event Manager, Yacht Captain, or Estate Manager as to Principle 1's intended moves/events. AIC will determine support needs and communicate to EP team, EP Lead Advance, Principle 1 Advance, or both will support as needed.

▶ Principle 1 AIC will determine vehicles and support contractors to be used and will delegate responsibility as needed.

▶ EP will attempt to pre-advance any known venues and will coordinate arrivals, event access, security and medical procedures.

▶ Principle 2

- ▶ XXXX- AIC/Lead
- ▶ XXXX- Advance

▶ EP will receive direction from Event Manager, Yacht Captain, or Estate Manager as to Principle 2 intended moves/events. AIC will determine support needs and communicate to EP team, EP Lead Advance, Principle 2 Advance, or both will support as needed.

▶ Principle 2 AIC will determine vehicles and support contractors to be used and will delegate responsibility as needed.

▶ EP will attempt to pre-advance any known venues and will coordinate arrivals, event access, security and medical procedures.

Event Staff / Support Staff

13

► Cannes Film Festival / Monaco GP

- Event Manager.
 - Event Support Staff
 - Event Support Staff
 - Event Support Staff
- Event Manager and Event Support Staff will coordinate access, credentialing, and ticketing for events relating to Cannes Film Festival and Monaco GP. They will be primary point of contact for daily updates on planned and spontaneous event attendance by the Principals and guests.
- Event Manager and Event Support Staff will coordinate access control, invites, VIP admittance into any Yacht based parties or events.
- EP will coordinate security as needed

► Yacht and Estate Staff

- Yacht Captain Ch. Officer
 - Ch. Stew
 - Purser
- Estate Manager
 - House Manager
- Yacht Capt. And Estate Manager will coordinate Principal movements initiating from either location. They will communicate any security, transportation, or logistical needs to EP.
- For Yacht or Estate based parties, Stakeholders will coordinate the level of EP support required or requested from the Principals.
- EP will coordinate security as needed

Vendor Support

14

- ▶ Jupiter Executive Protection
- ▶ Jupiter Lead
 - ▶ EP will evaluate the role and duties required of EP support vendors and will assign daily/team responsibilities upon arrival in France.
 - ▶ EP will conduct a pre-mission brief with all support vendors to include general Principal EP support, Emergency Actions, Communication, Advance and Close Protection procedures, etc.
 - ▶ EP will ensure that vendors actions reflect the quality of service required of Executive Protection Agents.

Communication

15

- ▶ Communication
 - ▶ Primary: EP Issued Phone
 - ▶ Secondary: Motorola Radio
 - ▶ Tertiary: Local Phone
 - ▶ Tracker: Traxtll Devices
- ▶ EP will communicate any external messages to the ~~owner~~ DL. Messages include: Principal Moves, Discussion of Principal Intent, Etc.
- ▶ EP will communicate any internal messages to either EP or Team Internal. Messages include questions regarding coverage, schedule, EP specific items, or any private conversations.
- ▶ Traxtll will be employed for AIC / Adv Monitoring, and Emergency / Evacuation
- ▶ Radio Communication will be conducted unobtrusively and will focus on Principal Arrivals / Departures, Movements, Emergency Situations.
 - ▶ Radios should be employed discreetly so as to not indicate that EP is performing protective services.
 - ▶ When not utilizing radios, earpieces and radios should remain out of sight / printing.
 - ▶ Drivers will maintain radios in vehicles at all times during coverage.
 - ▶ Plain speech is to be used on radios. No 10 codes or other agency specific acronyms / verbiage if possible.

Emergency / Medical Actions

16

► **Emergency Actions**

- Most Likely Course of Action:
 - Theft, Large Crowds, Peaceful Demonstrations, Vehicle Accident, Attempting to Gain Access to Principal
- Most Deadly Course of Action:
 - Individual Assault, Kidnapping, Attempt, Unruly Protests, Attack on Motorcade/Principal, Terrorist Event
- EP will prepare for known events and will attempt to avoid Principal attendance if high level of risk or attendance is otherwise inadvisable.
- EP will ensure the safety of the Principal and will attempt to disengage from any threat and evacuate the area. A/C will cover and evacuate. Advance/Vendor will provide support as needed.
- A/C will relocate Principal to most suitable / nearest safe Haven, Hard Room, or Vehicle and will assess what further action to take.

► **Medical Actions**


- Most Likely Medical Issues:
 - Inherent Principal Health Concerns, Illness, Vehicle Accident, Water related Accident, Dive Injury/Illness
- EP will assess the Principals state of health, level of injury, and will determine course of action to take
- EP will make use of local Emergency Medical Teams as suitable
- EP / Vendor EP Support / Drivers will be familiar with most suitable and nearest Emergency Locations and will continually prepare for Emergency / Medical plans while on coverage of the Principal.
- EP will communicate any Emergency or Medical actions taken.
- EP will perform medical treatment only within the scope of their certification.




18

Emergency Points of Contact


US Embassy, US Consulate, Emergency Services



US Consulate
12 Boulevard Paul Peytral, 13006
Marseille, France
For American citizens, or if calling about an American citizen in an after hours emergency situation please call +33 (0)1 45 12 22 22 and then dial 9 (toll) when you hear the automated greeting. You will be connected to our live telephone attendants immediately. Ask to speak with the Embassy Duty Officer who will assist you.



US Embassy
4 Avenue Gaspard, 75008 Paris, France
PARIS, FRANCE
For American citizens calling to report the death or serious health issue of an American citizen in France, or about a missing person, please call: +33 (0)1 45 12 22 22 and then dial 9 (toll) when you hear the automated greeting.



US Consulate
35 Lungarno Vespucci Amerigo, Firenze, FLORENCE, Italy
For American citizens with an after hours emergency and who are within the Florence consular district, please call the switchboard at (+39) 055 244 151. The Florence consular district includes the regions of Tuscany, and Emilia-Romagna (all except the Provinces of Piacenza and Parma).

Safe Haven – Cannes

19

<h2>Radisson Blu</h2> <p>EP Hotel will be used as a Safe Haven for Principals West of Palais</p>	<h2>Gare Maritime</h2> <p>Upper Office level of GM can be used as a hasty Safe Haven</p>	<h2>Carlton</h2> <p>The Carlton Hotel will be used as a Safe Haven East of Palais</p>
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Safe Haven – Nice / Monaco

<h2>Hotel Negresco</h2> <p>37 Promenade des Anglais 06000 Nice, France +33 (0)4 93 16 64 00</p>	<h2>Grand Hotel du Cap Ferrat</h2> <p>71 Boulevard du Général de Gaulle 06230 Saint-Jean-Cap-Ferrat, France +33 (0)4 93 76 50 50</p>	<h2>Hotel de Paris</h2> <p>Place du Casino 98000 Monaco +377 (0)98 06 30 00</p>
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Evacuation Planning

20

► Evacuation

- Most Likely Causes of Evacuation:
 - Natural disaster
 - Industrial disaster
 - Political instability
 - Epidemic illness / Viral Outbreak
- The sequence of an evacuation can be divided into the following phases:
 - Detection
 - Decision
 - Alarm
 - Reaction
 - Assembly
 - Transportation
- Scale of Event Determines Level of Evacuation
- EP Lead will be the primary decision maker on any land based Evacuations.
- Yacht Captain will be the primary decision maker on any Yacht based Evacuations.

► Land Based Evacuations

- EP will determine the severity and extent of the disaster and will begin formulating options for Evacuation
- EP will determine the most suitable method and location of Evacuation and will begin gathering resources to aid in transportation, logistics, and security of the Principals
- EP will inform the ICanner DL, Executive Services, IVFM Flight Coordination, of the nature of the disaster and EP's prepared response plan and will establish a known rally point to stage the evacuation from
- EP will coordinate all elements involved in order to provide the safest and most expedient co-location of assets
- EP will gather all Principals at the established rally point and ensure that all personnel are accounted for
- EP will load all Principals in coordinated transportation and relocate them to a suitable area. EP will assess the safety and health of all personnel involved and will develop plans for post-Evacuation.



Jupiter Executive Protection
Capability Statement

Client: Jim Brickhouse
Date: 21st August 2018

Report Title	Prepared for Jim Brickhouse – Excession LLC
Client	Excession LLC
Report No:	Jupiter/Excession/2018
Status and Version	Final
Date of Release	21 st August 2018
Introduction	<p>This capability statement has been produced to provide information in respect of Jupiter’s risk management capabilities and global resources.</p> <p>Jupiter is a specialist risk management consultancy. Jupiter’s expert team of security specialist have backgrounds with the UK Special Forces, UK Police Special Branch Counter Terrorist Unit and Royal/Diplomatic protection.</p>

<p>Jupiter's Capabilities</p>	<p>With a global resource network established of over twenty years Jupiter is a leading international specialist providing first class executive protection, risk consultancy and private investigation services with an unrivalled reputation in close protection and asset security. We help clients in understanding and assessing risks that threaten their operational capability and continuity in today's unpredictable environment. We further help clients manage and mitigate personal risks by training personnel and conducting risk assessments.</p> <p>Our wide-ranging services are discreet, and our training programmes are bespoke in order to meet the specific requirements and needs of our clients. We provide our clients with best-in-class professional services; our experienced and highly qualified consultants have a wealth of knowledge gained over many years in criminal investigation and the close protection sector, which ensures that our clients always receive a current, competent and up to date service.</p> <p>Jupiter has world-class capability across the field of close protection, private investigation, transportation, event logistics and concierge.</p> <p>We can co-ordinate; manage projects and consult in the following areas;</p> <p>VIP protection, electronic counters measure sweeping, worldwide personnel background checks, residential security, narcotics firearms and explosives dog search teams, provision of limousines and police trained drivers, close protection and personal safety training</p> <p>Transportation and Logistics planning</p> <p>Public affairs & lobbying, Strategic Communications, Reputational Management, Events Industry Contacts</p> <p>Household and Property</p> <p>Relocation, Purchasing and selling negotiations, Home design, Domestic staff appointments including PAs, Chefs, Child care, Pet Care, Security and technology, School admissions, Personnel Security</p> <p>Travel and Leisure</p> <p>Personalised itineraries, Celebrity hideaways, Exotic locations; Selected villas, Chalets, Private islands, Exclusive private Properties, Yacht chartering and acquisitions, Private jets, Helicopters</p> <p>Global Locations</p> <p>Jupiter is administrated & managed from London. It has offices and full-time operational staff in Qatar & the Isle of Man. Jupiter's affiliated companies are:</p> <p>Jupiter's Affiliate Companies</p> <p>Berkeley Private Office – Provision of house managers & residential security teams for in London & France. Provision of executive cars & drivers.</p>
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<p>Jupiter Close Protection Management</p>	<p>Yachtmasters UK – Established in 2009 sales and charters of superyachts specialising in the 40m + yacht market. www.yachtmasters.com</p> <p>Allmode Limited UK – Maritime security company specialising in global armed superyacht security teams based in the Isle of Man. www.allmode.org</p> <p>Jupiter Military & Tactical Systems Qatar – Provision of x10 fulltime helicopter instructors to the Qatar Air Force. Provision of x6 full time Special Forces Instructors within the Qatar Amiri Guard Special Forces.</p> <p>Jupiter has the ability to call on the expertise of X law enforcement specialists with a wide range of skills in crime prevention, counter terrorist protection, specialist search teams, technical surveillance and monitoring, covert intelligence gathering and analysis. All of our employees are of the highest integrity with impeccable backgrounds and have been vetted to the top levels in government clearance.</p> <p>Jupiter Management</p> <p>David A – Close Protection Manager David is an accomplished senior manager whose diverse career spanning over 30 years in the United Kingdom Police Force has provided him with skills necessary to lead business critical operations and projects within a range of international environments. Operates at the equivalent of senior manager level, driving operational excellence on both a strategic and tactical level and has managed cross-functional, multinational teams across Europe and the Far East. David is highly motivated, professionally qualified close protection officer and security consultant who has worked in the UK and overseas, in Crime Investigation, Counter Terrorism, and Close Protection for the British Royal Family, Prince Albert of Monaco, President Hamid Karzi, UK Prime Ministers, Government Ministers, Ambassadors, Military Personnel and Protected Witnesses.</p> <p>Stuart L– Close Protection Manager Stuart is loyal and widely experienced team leader with more than 30 years police service and over 22 years management experience. Very confident, energetic and self- motivated. He is an excellent communicator with proven organisational and interpersonal skills, able to work effectively alone or as part of a team. From 2010 to 2013 Stuart served as a Detective Sergeant in the Metropolitan Police Service SO1 Specialist Protection team. Stuart was the operational supervisor and team leader responsible for planning and managing ministerial protection operations within the UK and also to high risk/low infrastructure countries including Afghanistan, Pakistan, Nigeria, East Timor and South Sudan.</p>
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EXHIBIT C

From: Jupiter Private
Sent: Fri 8/17/2018 10:10 AM (GMT-07:00)
To: "James Brickhouse" <jbrickhouse11@gmail.com>
Cc:
Bcc:
Subject: Project Rowena

Jim, we are progressing. Early feedback on the target is there is indeed an unpleasant undertone to some of his lifestyle choices.

My lead investigator is meeting with a contact within the Chiang Rai police tomorrow (Saturday) evening local time to have an off he record beer.

Early conversations would indicate that he feels that any questions they may have had prior or post cave recovery would be suppressed as the Thai local and federal government are using the success to boost tourism and divert Thailand away from its historical sex tourist industry.

I will have more feedback and timelines for you over the weekend. There is no question that the target 'associates' locally with Europeans who enjoy 'Thai comforts' that are not acceptable in a developed society.

Evidence of this would not be difficult to obtain.

Kings regards,
James
CEO - Qatar & UAE
Jupiter Military & Tactical Systems
893, Doha Expy, Doha, Qatar
[+44 \(0\) 7917 401601](tel:+44207917401601)
info@jupiter-private.com
www.jupiter-private.com



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On 16 Aug 2018, at 22:23, James Brickhouse <jbrickhouse11@gmail.com> wrote:

Received, thank you. We just missed the cut-off for today, but will send it first thing tomorrow morning.

On Thu, Aug 16, 2018 at 12:17 PM, Jupiter Military & Tactical Systems <info@jupiter-private.com> wrote:

Jim,

Attached is the Invoice for **Project Rowena** which is our working title for the investigation.

Please let me know when payment has been made and I will call you tomorrow evening GMT to update you with further progress and allow provide you with some milestones and timings.

Any questions my phone is always with me 24/7

Rgds, James

Regards,

James
CEO - Qatar & UAE
Jupiter Military & Tactical Systems
Al Saad – Area 38
Street No. 893
Building No. 7
P.O. Box 22509
Doha, State of Qatar
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On 16 Aug 2018, at 01:33, James Brickhouse <jbrickhouse11@gmail.com> wrote:

Thanks, James. We've signed and attached the NDA.

We'd like to be able to do this for \$20,000 dollars. Does that work for you?

Thank you,

Jim

On Wed, Aug 15, 2018 at 12:05 PM, Jupiter Military & Tactical Systems <info@jupiter-private.com> wrote:

Jim,

Attached is the NDA which should be from you to me if I am the contractor if that makes sense.

Investigations as I'm sure you will know can be time consuming and are event driven. I think I have a clear remit of what specifically you are looking for and the starting point would be in the UK and in Thailand.

The UK end it quite straight forward but if there are any skeletons in the cupboard they are more likely to be in Thailand which is where I will centre the investigation.

Typically I have always worked on a retainer with these types projects and I would prove this at two men for ten days at £900 GBP per day.

That would be £18,000 for a full background investigation which would look at lifestyle choices for the target known associations, discreet enquiries in the target's place of work and relaxation.

The target is unlikely to have a history of offending in the UK as this would already have come to the surface but I think like others that his motivations for residing in Thailand may unearth some unsavoury practises and relationships.

I can provide professional references if requested.

My career in short is 11 years in the UKSF and 2 years with the UK Security Services.

Over the past 15 years I spent 10 yrs working for Vulcan Inc (Paul Allen) running his maritime and European EP and for George Soros.

Please call if you have any questions at any time.

Kind regards

James
CEO - Qatar & UAE
Jupiter Military & Tactical Systems
Al Saad – Area 38

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On 15 Aug 2018, at 18:40, James Brickhouse <jbrickhouse11@gmail.com> wrote:

EXCESSION, LLC

On Wed, Aug 15, 2018 at 10:23 AM, Jupiter Private <info@jupiter-private.com> wrote:
Jim, can you send me the corporation name and contact info for the NDA.

Regards,
James
CEO -Qatar & UAE
Jupiter Military & Tactical Systems
893, Doha Expy, Doha, Qatar
[+44 \(0\) 7917 401601](tel:+4407917401601)
info@jupiter-private.com
www.jupiter-private.com
<image002.jpg>

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On 15 Aug 2018, at 18:18, James Brickhouse <jbrickhouse11@gmail.com> wrote:

James,

As discussed, please forward the NDA asap, as well as a cost estimate on what work like this might entail.

Thank you,

Jim

Please call my cell anytime: [REDACTED]

<One Way Non-Disclosure Agreement For Contractor.pdf>

EXHIBIT D

From: Jupiter Military & Tactical Systems
 Sent: Mon 8/27/2018 9:47 AM (GMT-07:00)
 To: "Jim Brickhouse" <jbrickhouse11@gmail.com>
 Cc:
 Bcc:
 Subject: Project Rowena Update

Jim,

Further information will be forthcoming as the team continues with the tasking:

GREEN what we know as fact.

ORANGE what we are in the process of verifying

RED - hearsay or unproven and not based on any facts

- When did he move to Thailand? 2011? **The target moved permanently to Thailand in the 2010. Prior to this the target had been spend periods of upto six months at a time living and travelling in different parts of the country.**
- How long prior to that had he been visiting? Does he have a history of visits? **The target has been traveling on and off to Thailand for cave exploration since the late 1980's.**
- Why that town/village? **This village (Huai Khrai) is where the targets wife (extended family) is from and where she grew up . She is now the VP Executive of the SAO - Subdistrict Administration Organisation in Huai Khrai,Chiangrai Province**
- When did he divorce his wife in the UK? **This information is not yet available to me.**
- Did his resignation from Quaternion House LTD coincide with his move to Thailand? Or had he moved prior to that? **Mr Unsworth moved permanently to reside in Thailand in 2009. His Quarternion career as a mortgage broker was on a part time basis. He had moved to Thailand before his resignation and would have resigned at the end of the Tax year in March 2011 to benefit from the tax benefits.**
- Is he independently wealthy? Does he make money from his coffee shop? **The target is not independently wealthy. He has not pension savings scheme and only has one property in the UK which is mortgage free. This property is rented out for approximately £800-£850 PCM. The asset () is valued at £850,000 GBP but has a low rental income. The target does not have large amounts of disposable income.**
- Do you have more details regarding his coffee shop/hobby? **The target does not own a coffee shop but does have a keen interest in local Thai Coffee producer and often makes visit to these plantations to purchase coffee beans to roast himself. We regard this as a hobby.**
- Have you spoken to his main competitor to see what information they may have? **??? No - we don't regard the target as having a main competitor**
- What are his living conditions in Thailand? **His living conditions are basic compared to the developed world but would be considered an above standard in this part of Northern Thailand. He has running clean water, sanitation, wifi and satellite TV.**
- When did he marry his wife in Thailand? 2011? **We are in the process of verifying this information.**
- When did he meet his wife in Thailand? **Target met his wife in 2008 in her role as Vice Presient of the local commune. She is a colloquial English speaker. She was introduced to the target by a mutual English friend. After the initial introduction the target approached his now wife to enquire to her for permission to map & explore local cave networks.**
- How did he meet her? **See above**
- What was her age when they met? **The target is 63 years old. His wife we believe is 30 which would have put her at 18/19 when they first met. The target would have been 52 yrs old at the time.**

This is NOT verified yet but will be ASAP. His behaviour is at best described as a "Manther" - UK slang for opposite of Cougar.

- Was she the 10th teenage girl he met before he decided to settle? **We are collecting evidence from local X Pats who have known the target for the past decade to establish targets 'hunting patterns'**

Kind regards,
James

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On 27 Aug 2018, at 00:38, James Brickhouse <jbrickhouse11@gmail.com> wrote:

Hi James - Clearly we'd like the information now. There is some urgency to this situation. We believe there are planned attacks in the media and/or a lawsuit that are imminent. With that

said, we aren't looking to frame anyone. If there is definitively no smoking gun, then let's get the information necessary to make that determination and it is what it is. But if there is something more, we need information asap. Some of the specific questions that would be good to answer are:

- When did he move to Thailand? 2011?
- How long prior to that had he been visiting? Does he have a history of visits?
- Why that town/village?
- When did he divorce his wife in the UK?
- Did his resignation from Quaternion House LTD coincide with his move to Thailand? Or had he moved prior to that?
- Is he independently wealthy? Does he make money from his coffee shop?
- Do you have more details regarding his coffee shop/hobby?
- Have you spoken to his main competitor to see what information they may have?
- What are his living conditions in Thailand?
- When did he marry his wife in Thailand? 2011?
- When did he meet his wife in Thailand?
- How did he meet her?
- What was her age when they met?
- Was she the 10th teenage girl he met before he decided to settle?

If you are able to carefully do a 'press' interview with him or her - or both, then I say let's use any and all creative methods possible. But maybe better separate so he doesn't influence her willingness to be forthcoming. I'm told there may have been some journalists who have attempted to pull his criminal records in Thailand. I'm guessing that any such effort has only served to alert his wife and possibly motivate him to alter his behaviors for a time while the spotlight is on him.

If employing additional asset is possible, in the interest of time, we will support this - even if it mean an additional expense. Are there other assets or an additional group we should consider including in this effort? We need a definitive determination one way or another as soon as humanly possible.

On Sun, Aug 26, 2018 at 11:07 AM Jupiter Private <info@jupiter-private.com> wrote:
Jim, what are the timings for the project ?

How much time do we have ?
On the phone is you need to call.
regards,
James

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EXHIBIT E

From: Jupiter Military & Tactical Systems
Sent: Thu 8/30/2018 11:04 AM (GMT-07:00)
To: "Jim Brickhouse" <jbrickhouse11@gmail.com>
Cc:
Bcc:
Subject: Rowena Report
Attachments: Project Rowena00001.pdf; image00200002.jpg

Jim,

Attached a preliminary report of where we are and follow up actions.

I will write a seperate report on the media push.



I would like to send this from an encrypted address.

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Project ROWENA
AUGUST 30th 2018


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Subjects Full Name	Vernon Harry UNSWORTH
Date of Birth	[REDACTED]
Address in Thailand	<p>[REDACTED]</p> <p>Thailand - VERIFIED</p> 
Address in United Kingdom	<p>[REDACTED]</p> <p>AL3 5QG - VERIFIED</p> 
[REDACTED]	VERIFIED
Criminal Record Search	No civil or criminal charges have been recorded within the United Kingdom or Thailand
Sex Offender Register	<p>No Sex Offenders registrations recorded within the EU</p> <p>EU Offender Search includes current and historical sex offender registration records from all EU member states this also includes List 99 and the Interpol register.</p> <p><i>Please note that the type of crimes that require registration vary by EU member state therefore not all individuals convicted of a sex crime in one EU member state may be included in another EU member state's registry.</i></p>
Credit Check – Limited information was recorded at the address listed above.	No adverse records or outstanding judgements recorded at the UK address provided above. No indication of financial stress.
Current location	Arrived back in the UK from Thailand on 29th August and is currently living with his Mother Vera Unsworth in Braintree, Essex. Approx. 55 miles from London.
Income	Mr Unsworth is renting his house out in St. Albans for £875.00 GBP per calendar month. He lives rent free in Thailand as the home he shares with his wife is owned by his mother in-law.

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		<p>Mr Unsworth also works part-time in his mother in laws shop.</p> 
	Background	<p>Mr Unsworth was educated Verulam School which is a state secondary school for boys with an academy status in St Albans, Hertfordshire. He spent his career in unregulated financial sales, most recently as a self-employed mortgage broker which he gave up in 2009 when the UK mortgage market became fully regulated.</p> <p>He was a competitive motor cycle bike racer competing in two Ilse of Man TT's races in 1983 & 84'.</p> <p>He has been a frequent visitor to Thailand since the 1980's. Prior to meeting his current wife we believe that Mr Unsworth was living in the Pattaya Beach which is a well-known tourist destination. Pattaya Beach is synonymous with prostitution and scam artists. We are in the process of verifying this information which was mentioned to the lead investigator by Mr Unsworth mother-in-law.</p> <p>Mr Unsworth has been described to our investigation team by other UK volunteers attached to the Cave Rescue team as a 'Manther' slang for an older man with a taste for younger women.</p> <p>It's a reasonable assumption in life that if you come across a mature man in a relationship with an obviously much younger women that this in itself is out of the ordinary behaviour.</p>
	Thailand	<p>Mr Unsworth spends on average ten months a year in Thailand maintaining a relatively low profile in his community. He was described to our investigators as friendly but quiet. He spends most of his day to day time working as an assistant in his mother-in-law's road side shop.</p> <p>Mr Unsworth drives a Japanese 4X4 vehicle with a value of \$1000 USD.</p> <p>Mr Unsworth moved permanently to Thailand in the 2010. Prior to this he had been spending periods of up to six months at a time living and travelling in different parts of Thailand & travelling in South East Asia.</p> <p>His living conditions are basic compared to the developed world but would be considered an above standard in this part of Northern Thailand. He has running clean water, sanitation, Wi-Fi and satellite TV.</p>

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	<p>Mr Unsworth met his wife in 2008 in her role as a secretary to the Chief Executive of the local commune. She is a colloquial English speaker. Mr Unsworth wife was introduced to him by a mutual English friend.</p> <p>After the initial introduction the Mr Unsworth then approached his now wife to enquire with her in seeking permission to map & explore local cave networks.</p> <p>Mr Unsworth is 63 years old. His wife we believe is 30, (we will confirm this in the next 48hrs) which would have put her at 18/19 when they first met. The target would have been 52 yrs old at the time.</p> <p>If this is the case that Mr Unsworth choose to live in Pattaya Beach before moving to Northern Thailand, then it would be a strong indicator as to his lifestyle interests. If we can establish that Mr Unsworth was a regular visitor to this part of Thailand which is not known for its extensive cave networks then this is something that may support the assumption that he is a "Sexpat"</p> <p>The sexpat whore-mongers his way through the go-go bars of Thailand. His only other friends are his sexpat peers. Peek-density occurs in and around Pattaya – Thailand's sin city.</p> <p>Interestingly our investigators in Thailand who have shared a beer with some of the UK & Dutch divers who also volunteered stated that Mr Unsworth was not a popular man or particularly liked man in the Cave Rescue Team. When pushed as to why, they simply replied "Creepy"</p>
Next Steps	<p><u>THAILAND</u></p> <p>The Thai investigation team will follow existing lines of enquiry specifically looking at the following questions:</p> <p>Can we confirm that Mr Unsworth was a frequent visitor to Pattaya – This can be established by checking old visa applications that he would have made on entering Thailand. Mr Unsworth would have had to have a registered address, hotel or apartment. If he stayed with a friend, then who? Is that friend a known Sexpat? We are running these lines of enquires.</p> <p>We are running an interview with his wife tomorrow and will be able to ask more searching questions about the relationship and specifically looking at her age when they met and how he courted her.</p> <p>Vernon Unsworth is an unpopular loner which makes the investigation more difficult as we are always looking for friends to lead us into certain conversation topics.</p> <p><u>UK</u></p> <p>Mr Unsworth is a member of Verulam Golf Club www.verulamgolf.co.uk and he will be playing Golf there in the coming weeks. The investigation team will be looking to integrate itself with him either as part of a playing four ball or</p>

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		<p>in the clubhouse bar. This will be to establish how far along the legal route he has gone and what the strategy is. The Golf Club are planning to host an evening dinner in his honour.</p> <p>*Unless instructed, we are not running mobile and foot surveillance on Mr Unsworth during his visit in the UK.</p>
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	Subjects Full Name	Voranun Radravipakkun (Nickname - Tik) wife on Vernon Unsworth.
	Date of Birth	To Be Verified
	Address in Thailand	<p>[REDACTED]</p> <p>Thailand - VERIFIED</p> 
	Current location	Currently in Chiang Rai returning to Huai Krai (home village) 31 st September.
	Income	<p>Tik is employed as a Secretary for the Chief Executive of the SAO at Huai Krai SOA, Maesai, Chiang Rai (Subdistrict Administration Organization) working address is 95 m.4 Baan Hong Hae, Huai Krai, Maesai, Chiang rai, 572200.</p> <p>Phone number; [REDACTED]</p> <p>Her personal phone number cell is [REDACTED]</p> 
	Background	Tik was born and raised in Chaing Rai and lives with Mr Unsworth in a house belonging to her mother.

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	Thailand	Tik is spoken about as someone who is popular in her village and well known as she is the only good English speaker in the commune of 12 villages.
	Next Steps	<u>THAILAND</u> The focus of the investigation with Tik is in establishing what age she was when she met with Mr Unsworth. This information should be confirmed by the Thai investigation team within the next 48hrs.



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